



**PRODUITS CHIMIQUES HANDY LTÉE  
HANDY CHEMICALS LTD.**

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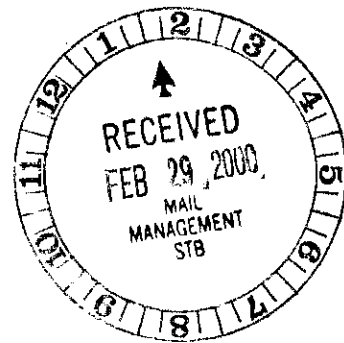
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February 23<sup>rd</sup>, 2000

**ENTERED  
Office of the Secretary**

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**MR. VERNON A. WILLIAMS, SECRETARY  
Surface Transportation Board  
Office of the Secretary  
Case Control Unit  
ATTENTION: STB Ex PARTE NO. 582  
1925 K street, N.W.  
Washington, D.C. 20423-0001**

Dear Sir:

HANDY CHEMICALS LTD. is a chemical manufacturing company that is a growing user of rail service in the United States and Canada. The purpose of this letter is to comment on the issues to be discussed on March 8<sup>th</sup>, 2000 in Ex Parte 582.

We encourage the Surface Transportation Board to focus on whether the proposed CN-BNSF combination is good for shippers, not on potential downstream effects. The CN-BNSF combination should be judged on its merits and if other carriers propose mergers, then these cases ought to be evaluated on their merits.

The timing of the proposed CN-BNSF combination is not the central issue for our company. Our concern is service. Recent mergers have failed on service, not because of timing. Accordingly, the Surface Transportation Board should focus on ensuring that CN-BNSF combination, and any other future mergers, will deliver service.

The Surface Transportation Board has a comprehensive process to evaluate railroad transactions and protect the public interest. It should fairly evaluate the CN-BNSF combination according to that process. Do not let other railroads use the Surface Transportation Board process to protect themselves and not shippers.

*Sincerely,*

Alan G. Garwood  
Quality Assurance Director  
AG/yl